



YELENA SHAROVA, ESQ. \*+  
DOMINIQUE MYERS, ESQ. \*  
T. ALEXANDER STAUCH, ESQ. \*  
THOMAS TYRRELL JR., ESQ. \*  
NANI KIM ESQ. \*  
\*NY +NJ

Telephone 1.718.766.5153  
Facsimile 1.718.504.3599  
Email sharova@sharovalaw.com

PARALEGALS:  
FRANKLIN DAVIS JR  
VICTORIA FEDARAVA  
ALVIN KORSUNSKIY  
MABEL SANTANA  
GRIGORIY SHUBA

June 7, 2024

**VIA ELECTRONIC FILING**

Honorable John Koeltl  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

**APPLICATION GRANTED  
SO ORDERED**

Re: US v. Herrera 21 Cr. 680 (JGK)

  
John G. Koeltl, U.S.D.J.

Dear Judge Koeltl:

Counsel for Steven Herrera respectfully submits this letter to request (1) early termination of his GPS monitoring; and (2) permission to travel to Detroit Michigan for his college graduation from the period of June 28, 2024, to July 2, 2024.

Mr. Herrera has been in complete compliance of all of his pretrial, probation and post sentence conditions imposed by the court. Mr. Herrera has never had an issues or complaints in violations of any of his conditions. As a result is requesting early termination of GPS monitoring.

Mr. Herrera has a college graduation scheduled for June 29, 2024 in Detroit Michigan. Mr. Herrera is requesting to travel to Detroit Michigan via car on June 28 and would return July 2, 2024. During the trip Mr. Herrera would stay at the Wyndham Garden Detroit Metro Airport.

Both Probation, through Officer Sabrina Gargano and the Government, through Assistant US Attorney Rebecca Dell have no objections to either request.

Thank you for your time and attention in this matter.

Respectfully Submitted,  
Yelena Sharova  
Attorney for the Defendant  
By: /s/ Yelena Sharova

CC: All Parties (via ECF)

